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August 15, 2013

VIA EMAIL

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Saleem and Singh, et al. v. Corporate Transportation Group, Ltd., et al.*, No. 12 Civ. 8450

Dear Judge Furman:

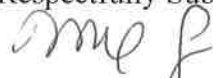
As you know, we represent Defendants in this matter. We request a two week extension of time to oppose plaintiffs' motion for class certification, from August 21, 2013 to September 4, 2013. We make this request because the scheduling of depositions relevant to our opposition has been delayed due to scheduling conflicts and by the hearings on plaintiffs' motion for a preliminary injunction. We have not previously requested an extension of this deadline, and Plaintiffs consent to it.

Additionally, the parties jointly seek a two-week extension of the discovery deadline, from September 16, 2013 to September 30, 2013, as well as extensions of the deadlines for dispositive motions and trial following discovery. Both parties have been working diligently to comply with their discovery obligations, but need additional time to complete document discovery that is currently outstanding. Defendants are currently in the process of reviewing thousands of emails requested by Plaintiffs, and expect to be able to produce them in the coming weeks. Plaintiffs, for their part, are collecting, extracting, and reviewing text messages from mobile devices for the 16 discovery opt-ins, pursuant to the Court's recent orders regarding the scope of discovery. Plaintiffs also expect to be able to complete that process within the coming weeks. A two-week extension will allow the parties the opportunity to review these documents and use them to develop the record more fully in upcoming depositions. In response to the parties' one previous joint request, Your Honor extended the discovery deadline thirty days solely so that the parties might explore settlement through private mediation. We respectfully request that Your Honor grant this joint request for an extension of the discovery period and "so order" the enclosed, revised case management plan.

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We thank the Court for its attention to this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'me f', written over the printed name.

Margaret C. Thering